

Message

From: Keller, Lynn [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=08038B86D66A47D3AACA8BEE1A63A5A7-LKELLER]
Sent: 4/12/2018 8:16:51 PM
To: Fennessy, Christopher [christopher.fennessy@Rocket.com]
Subject: RE: [EXTERNAL] RE: Aerojet - Area 40 CEQA

Still working on this, Chris; hope to have more info for you soon. There is a new USACE project manager assigned to the Hillsborough development, and it looks like the Section 404 permit was sent to the permittee for signing. I'm checking with my NEPA and Wetlands groups here at the EPA Regional Office.

Lynn M. Keller, EI, PMP
US EPA Region 9 RPM
75 Hawthorne St, SFD 7-1
San Francisco, CA 94105
415-947-4162

From: Fennessy, Christopher [mailto:christopher.fennessy@Rocket.com]
Sent: Tuesday, April 10, 2018 8:34 AM
To: Keller, Lynn <Keller.Lynn@epa.gov>
Subject: FW: [EXTERNAL] RE: Aerojet - Area 40 CEQA

Hi Lynn – Can you please confirm that this information has satisfied the EPA's question regarding whether NEPA is required at this stage for the Area 40 action? Thanks! Chris

Christopher M. Fennessy, P.E.
Aerojet Rocketdyne, Inc.
Engineering Manager, Site Remediation
11260 Pyrites Way, Suite 125
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Ph: 916-355-3341
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Email: Christopher.Fennessy@Rocket.com

From: Fennessy, Christopher
Sent: Friday, March 16, 2018 12:16 PM
To: Keller, Lynn (Keller.Lynn@epa.gov); MacDonald, Alex@Waterboards (Alex.MacDonald@waterboards.ca.gov)
Cc: MacNicholl, Peter@DTSC (Peter.MacNicholl@dtsc.ca.gov) (Peter.MacNicholl@dtsc.ca.gov)
Subject: FW: [EXTERNAL] RE: Aerojet - Area 40 CEQA

FYI. Based upon below, we are not planning on preparing NEPA documentation at this time.

Christopher M. Fennessy, P.E.
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Email: Christopher.Fennessy@Rocket.com

From: Meerscheidt, John@DTSC [<mailto:John.Meerscheidt@dtsc.ca.gov>]

Sent: Friday, March 16, 2018 10:28 AM

To: Fennessy, Christopher

Cc: MacNicholl, Peter@DTSC

Subject: [EXTERNAL] RE: Aerojet - Area 40 CEQA

Hi Chris,

Approval of the Aerojet Rocketdyne Area 40 Removal Action Plan (RAP) is a discretionary action by DTSC that would trigger a CEQA review. However, I don't believe that there is a corresponding federal action associated with the Area 40 RAP that would trigger another NEPA assessment. As stated in your email, "the previous analysis (EIR/EIS) satisfied NEPA and this remedy doesn't change the conclusions or mitigation requirements, we are not planning on preparing a separate NEPA document."

Assuming that the environmental evaluation doesn't identify anything that would trigger a Supplemental or Subsequent CEQA document, I propose that we prepare and issue a CEQA Addendum to the Folsom Plan Area Specific Plan Environmental Impact Report/Environmental Impact Study (EIR/EIS). This would be analogous to the South of Highway 50 Backbone Infrastructure Initial Study that was prepared in 2014.

The Area 40 RAP Addendum could document this relationship with text similar to the South of Highway 50 Backbone Infrastructure Initial Study text shown below:

The City of Folsom and the land owners within the Folsom Plan Area Specific Plan area (FPASP area) are taking necessary steps to implement the development of the FPASP area based upon the approval of the FPASP. As required by the California Environmental Quality Act (CEQA) and the National Environmental Protection Act (NEPA), a joint Environmental Impact Report/Environmental Impact Study (EIR/EIS) was certified by the City Council on June 14, 2011 by Resolution 8860 for the FPASP (State Clearinghouse Number 2008092051). In the joint FPASP Final EIR/EIS, much of the infrastructure projects needed to provide services to the project were reviewed at a programmatic level with some impact areas including additional detailed analysis where applicable.

As the proposed project was included in the FPASP, and evaluated in the FPASP Final EIR/EIS, this IS/MND will tier from the program-level environmental review of FPASP Final EIR/EIS in conformance with Section 15152 of the State CEQA Guidelines. As a result, this IS/MND relies upon the FPASP and the program-level analysis provided in the associated FPASP Final EIR/EIS to the greatest extent feasible in order to determine the potential for impacts in each of the specific impact areas. Pursuant to CEQA Guidelines Section 15150(a), the FPASP and FPASP Final EIR/EIS are incorporated by reference. Both documents are available at the City of Folsom, 50 Natoma Street, Folsom, CA 95630.

Source: South of Highway 50 Backbone Infrastructure Initial Study, page 6

Please let me know if you have any questions, comments, or would like to discuss this further.

John

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From: Fennessy, Christopher [<mailto:christopher.fennessy@Rocket.com>]
Sent: Friday, March 09, 2018 11:23 AM
To: Meerscheidt, John@DTSC <John.Meerscheidt@dtsc.ca.gov>
Cc: MacNicholl, Peter@DTSC <Peter.MacNicholl@dtsc.ca.gov>
Subject: Aerojet - Area 40 CEQA

Hi John – During a meeting with EPA this week, EPA senior management inquired about how we are addressing NEPA for the Area 40 RAP. EPA is delegating their authority for the implementation of the remedy to the State, which is triggering the CEQA document. We have all agreed that the remedy only results in minor changes to the approved EIR/EIS and EIR Addendum, such that a second EIR Addendum is the appropriate document for this activity. Since the previous analysis (EIR/EIS) satisfied NEPA and this remedy doesn't change the conclusions or mitigation requirements, we are not planning on preparing a separate NEPA document. Do we need to formally document this in some way?

Thanks! Chris

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